

Sophie Hayes (12546)  
Western Resource Advocates  
307 West 200 South, Suite 2000  
Salt Lake City UT 84101  
801-212-9419  
sophie.hayes@westernresources.org

*Attorney for Western Resource Advocates*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO CHANGE ITS DEPRECIATION RATES EFFECTIVE JANUARY 1, 2021	Docket No. 18-035-36  <b>PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES</b>
---	--

Pursuant to Utah Code Ann. § 63G-4-207, Rule R746-1-108 of the Public Service Commission (“Commission”) Rules, and the Commission’s October 2, 2018 Scheduling Order, Notice of Technical Conference and Notice of Hearing, Western Resource Advocates (“WRA”) hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit conservation organization dedicated to protecting the land, air, and water of the West. WRA’s Clean Energy Program develops and implements policies to reduce environmental impacts of the electric power industry in the Interior West by advocating for a western electric system that provides affordable and reliable energy, reduces economic risks, and protects the environment through the expanded use of energy efficiency, renewable energy resources, and other clean energy technologies. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are ratepayers with PacifiCorp, doing business in Utah as Rocky Mountain Power. WRA has

participated in electric utility proceedings for over 20 years and has been granted intervenor status in multiple Utah Commission dockets.

2. WRA's legal rights and interests will be substantially affected by this proceeding. This proceeding will determine the depreciable lives of PacifiCorp's generation resources, which will impact the portfolio of electricity generation resources serving PacifiCorp customers. WRA's interest is related to the economics and economic risks associated with PacifiCorp's generation resources. To enable WRA to effectively analyze and assess these issues, and to provide intervenor expertise and input, WRA requests that its intervention be granted and that it be given party status in this proceeding.

3. WRA has not determined specific positions it will take or the relief it will seek. WRA seeks to intervene for purposes of protecting its interests as they arise.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing WRA to intervene.

5. WRA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Sophie Hayes  
Western Resource Advocates  
307 West 200 South, Suite 2000  
Salt Lake City UT 84101  
801-212-9419  
sophie.hayes@westernresources.org

Nancy Kelly  
Western Resource Advocates  
9463 N. Swallow Rd.  
Pocatello ID 83201  
208-234-0636  
nkelly@westernresources.org

Steven S. Michel  
Western Resource Advocates  
409 E. Palace Avenue, Unit 2  
Santa Fe NM 87501  
505-820-1590  
smichel@westernresources.org

6. WRA also requests that the following name be added to the electronic service list for this docket: Penny Anderson (penny.anderson@westernresources.org).

WHEREFORE, WRA respectfully requests that the Commission grant its petition for leave to intervene in this proceeding.

Dated this 25th day of October 2018.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



---

Sophie Hayes (12546)  
Western Resource Advocates  
307 West 200 South, Suite 2000  
Salt Lake City UT 84101  
801-212-9419  
sophie.hayes@westernresources.org

CERTIFICATE OF SERVICE  
Docket No. 18-035-36

I hereby certify that a true and correct copy of the foregoing was served by email this 25th day of October 2018 on the following:

**PacifiCorp/Rocky Mountain Power**

Yvonne Hogle

Jana Saba

[yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)

**Office of Consumer Services**

Cheryl Murray

Michele Beck

Béla Vastag

Philip Hayet

Donna Ramas

[cmurray@utah.gov](mailto:cmurray@utah.gov)

[mbeck@utah.gov](mailto:mbeck@utah.gov)

[bvastag@utah.gov](mailto:bvastag@utah.gov)

[phayet@jkenn.com](mailto:phayet@jkenn.com)

[donnaramas@aol.com](mailto:donnaramas@aol.com)

**Utah Division of Public Utilities**

Patricia Schmid

Justin Jetter

Chris Parker

Artie Powell

Erika Tedder

[pschmid@agutah.gov](mailto:pschmid@agutah.gov)

[jjetter@agutah.gov](mailto:jjetter@agutah.gov)

[chrisparker@utah.gov](mailto:chrisparker@utah.gov)

[wpowell@utah.gov](mailto:wpowell@utah.gov)

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Western Resource Advocates**

Sophie Hayes

Nancy Kelly

Steve Michel

[sophie.hayes@westernresources.org](mailto:sophie.hayes@westernresources.org)

[nkelly@westernresources.org](mailto:nkelly@westernresources.org)

[smichel@westernresources.org](mailto:smichel@westernresources.org)

Penny Anderson